

HEAD START TRIBAL CONSULTATION

September 11, 2008
Phoenix, Arizona

EXECUTIVE REPORT



OFFICE OF HEAD START
ADMINISTRATION FOR CHILDREN AND FAMILIES
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES



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TRIBAL PARTICIPANTS

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Colleen Alivado, Alamo Navajo School Board, Inc., New Mexico

Emma Anderson, Tribal Council Member, Hopi Tribe, Arizona

Patrick Andrews, Director of Education, Tohono O'odham Nation, Arizona

Phyllis Antone, Designated Tribal Representative, Gila River Indian Community, Arizona

Earl Apachito, Alamo Navajo School Board, Inc., New Mexico

Bradley Bledsoe-Downes, Designated Tribal Representative, Elk Valley Rancheria, California

Vernon Chavez, Lt. Governor and Tribal Council Member, San Felipe Pueblo, New Mexico

Jeanne Christopher, Designated Tribal Representative, Confederated Salish & Kootenai Tribes, Montana

Tony Collins, Tribal Council Member, Salt River Pima-Maricopa Indian Community, Arizona

Edward Delgado, Tribal Council Member, Oneida Tribe of Wisconsin

Rayma Duyongwa, Hopi Tribe, Arizona

Cheryl Encinas, Head Start Manager and Designated Tribal Representative, Pascua Yaqui Tribe, Arizona, Cherie Espinosa, Navajo Nation, Arizona

Cleon Esquibel, Pueblo of San Felipe, New Mexico

Patricia Foster, Head Start Director, Gila River Indian Community, Arizona

Rusty Gopher, Tribal Council Member, Rocky Boy Chippewa Cree Tribe, Montana

Stephen Honeyestewa, Head Start Director, Santo Domingo Pueblo, New Mexico

Misty Horne, Early Head Start Director, Iowa Tribe of Oklahoma

Warren Kontz, Inter-Tribal Council of Arizona, Inc.

Bernita Kuwaninvaya, Hopi Tribe, Arizona

Cedric Kuwaninvaya, Tribal Council Member, Hopi Tribe, Arizona

Naomi Kuwanvama, Tribal Representative, Salt River Pima-Maricopa Indian Community, Arizona

Ned Norris, Jr., Tribal Head, Tohono O'odham Nation, Arizona

Wendsler Nosie, Tribal Council Member, San Carlos Apache Tribe, Arizona

Albert Pablo, Designated Tribal Representative, Gila River Indian Community, Arizona

Chaslyn Pacheco, Santo Domingo Pueblo, New Mexico
Dwight Pickering, Caddo Nation, Arizona
Ron Ransom, Head Start Director, Salt River Pima-Maricopa Indian Community, Arizona
Nellie Reina, Salt River Pima-Maricopa Indian Community, Arizona
Tod Robertson, Iowa Tribe of Oklahoma
Quinton Roman-Nose, Designated Tribal Representative, Department of Education, Cheyenne and Arapaho Tribes, Oklahoma
Jessica M. Rudolfo, White Mountain Apache Tribe, Arizona
Kim Russell, Inter-Tribal Council of Arizona, Inc.
Noreen Sakiestewa, Head Start Director, Hopi Tribe, Arizona
Alton Sanchez, Santo Domingo Pueblo, New Mexico
Earl P. Sandoval, Tribal Council Member, San Felipe Pueblo, New Mexico
James Sandust, Designated Tribal Representative, Gila River Indian Community, Arizona
Eric Schurz, Salt River Pima-Maricopa Indian Community, Arizona
Joycelyn Shingobe, Commissioner of Education and Designated Tribal Representative, Mille Lacs Band of Ojibwe, Minnesota
Faye Smith, Head Start Director, White Mountain Apache Tribe, Arizona
Marie Starr, Tribal Council Member, Muckleshoot Tribe, Washington
Paula Thomas, Salt River Pima-Maricopa Indian Community, Arizona
Berna Vicente, Alamo Navajo School Board, Inc., New Mexico
Richard Walema, Sr., Tribal Council Member, Hualapai Tribe, Arizona
Misty Watahomigie, Head Start Director and Designated Tribal Representative, Hualapai Tribe, Arizona
Melvin WhiteBird, Lt. Governor and Designated Tribal Representative, Cheyenne and Arapaho Tribes, Oklahoma
Tammy Wickstrom, Mille Lacs Band of Ojibwe, Minnesota
Charlotte Williams, Tribal Council Member, Muckleshoot Tribe, Washington
Spencer Willie, Head Start Director, Navajo Nation, Arizona
Lamont Yazzie, Navajo Nation, Arizona

OFFICE OF HEAD START & OTHER FEDERAL PARTICIPANTS

Patricia Brown, Acting Director, Office of Head Start (OHS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS)

Amanda Bryans, Director, Educational Development and Partnerships Division, OHS, ACF, HHS

Ann Linehan, Director, Quality Assurance Division, OHS, ACF, HHS

Renée Perthuis, Director, Program Operations Division, and Acting Regional Program Manager, American Indian/Alaska Native Program Branch, OHS, ACF, HHS

Craig Turner, Director, Policy and Budget Division, OHS, ACF, HHS

Stacey Ecoffey, Principal Advisor for Tribal Affairs, HHS

Steve Henigson, Regional Administrator, ACF - Region X, HHS

ADDITIONAL ATTENDEES

Claude Endfield, Program Chair, Early Childhood, Northland Pioneer College, Arizona

Bonnie Groth, Executive Director, Arizona Head Start Association

Arnold Ramirez, Technical Assistance Network (TAN), Arizona

Michelle Sauve, AI/AN-TAN, Academy for Educational Development (AED), District of Columbia

Connie Schorr, Arizona Head Start-State Collaboration Director, Governor's Office for Children, Youth, and Families

TRIBAL CONCERNS & RECOMMENDATIONS

The Office of Head Start held its fourth FY 2008 Tribal Consultation on September 11, 2008, in Phoenix, Arizona. The purpose of the consultation session was to discuss ways to better meet the needs of Indian, including Alaska Native, children and their families, taking into consideration funding allocations, distribution formulas, and other issues affecting the delivery of Head Start services in their geographic locations. Concerns and recommendations shared by Tribal Leaders and other participants are highlighted in the discussion points and testimony below.

Consultation

- Tribal representatives appreciated the opportunity to meet with OHS leadership, but requested more advance notice for future meetings.
- Tribal Leaders requested greater involvement in future legislation.
- Tribal sovereignty, and respect for that sovereignty, was emphasized.
- OHS should provide clear guidance and clarification regarding the requirements of the Act.

Head Start and Early Head Start Funding

- Tribal representatives expressed widespread support for Head Start and Early Head Start programs.
- They expressed concern that Head Start funding levels have effectively decreased as standards and requirements have increased.
- Tribes without gaming have less available funding for all programs, and that should be considered.

Income Guidelines

- Tribes felt that Head Start should be made available for all children, regardless of income. To do otherwise is to discriminate against those families who have worked hard at getting out of poverty. In order to succeed, these families need continued support by Head Start and other programs rather than being shut out.

Conversion of Slots

- Tribes recognized an overall need for Early Head Start services.
- There was considerable discussion on the process and cost of slot conversion from Head Start to Early Head Start.

Program Reviews

- Many reviewers are not familiar with Tribal culture and provide one-on-one feedback that is inconsistent with the final monitoring report.

- There is a high turnover of review staff assigned to Tribes and a need to monitor reviewers for quality.
- Specific issues, such as Tribal traditions, need to be considered when examining program enrollment. Also local conditions, such as natural disasters, also need to be taken into consideration.

Facilities and Transportation

- The condition of existing Head Start facilities must be reviewed. There is a need for new, and possibly additional, facilities.
- Transportation is difficult when roads are unpaved and distances are long.
- The cost of transportation has risen significantly.
- The loss of transportation as an in-kind service toward the non-Federal share is a hardship for programs.

Risk Management

- Risk management meetings have brought issues forward, such as fuel costs, housing, and shrinking budgets.

Program Governance

- Meeting the requirements for governing bodies is difficult, as Tribal boards are elected and specific qualifications may not be represented.
- Mandated requirements need to be funded by the Federal government.

Culture and Language

- Tribal representatives expressed concern about the preservation of native languages and cultures.

Grantee Designation

- Tribes are concerned about the potential for non-Indian agencies competing for a Head Start program. There would be problems with having such an agency deliver services with a native emphasis.
- Tribes would not tolerate non-Indian agencies teaching in Indian country.

Staff Qualifications and Technical Assistance (TA)

- Low funding leads to high staff turnover.
- Tribes voiced concern about the need for funding to support the requirements for teacher certifications.
- Concern was expressed about adequate compensation for teachers to avoid attrition.
- Concern was also raised over the high rate of turnover of Head Start directors and the need for specific TA and mentoring for new directors.
- Tribes felt that the quality of TA they received was inconsistent.
- Given rural and isolated locations, Tribes support online and distance learning for staff professional development.

- Tribal colleges need to be funded to provide training to Head Start teachers where possible.
- Regarding background checks, there needs to be an explanation of the delay in getting this information out to programs.

Curriculum

- Tribes voiced support and concern over the requirement to use a scientifically based curriculum. They noted that Indian language and culture may not have been considered in the research used to evaluate the curriculum.
- The Tribes are eager to determine educational needs based on their local communities, cultures, and traditions. It is important to preserve culture, tradition, and languages; and to incorporate them into the educational experiences of Tribal children.

Transition to Kindergarten

- In general, the transition of children from reservation-based Head Start programs to local public kindergartens has been smooth, but has required concerted effort and considerable work from both the Tribes and the local education agencies (LEAs).
- Some LEAs can be difficult to work with, particularly around the provision of services to children with disabilities.
- Some Tribes were concerned that MOUs with LEAs might compromise sovereignty.

TESTIMONY

At this fourth Tribal consultation, Tribal Leaders and designated Tribal representatives opened the discussion by presenting testimony or otherwise saying a few words on behalf of their Tribes. They also had an opportunity to make remarks at the end of the consultation session. What follows are highlights from those remarks, as well as written testimony received by OHS.

Bruce Garcia offered greetings on behalf of **Lt. Governors Tonorero and Vernon Chavez, San Felipe Pueblo, New Mexico, Tribal Council Members**. Issues with regard to Head Start have been discussed in their Tribal Council. Mr. Garcia's testimony included the following:

"As members of the Tribal Council, it is our charge to help community with infrastructure, such as water and sewage, of which we are in the last stages. This was brought up here because of the need to select the priority that gets the money. Our Tribe decided to renovate the Head Start programs to meet the standards with our own funds. However, this is not an option for many Tribes. Our staff is to be congratulated on meeting all the regulations and standards associated with Head Start. Given support from Tribal leadership, Head Start programs can flourish. We want to provide quality service to our children, and we need more funding to accomplish this. Our community works hard to hold on to culture and language. Oral communication is used to pass down the language. Tribal nations must make the decision as far as board composition. Teachers are mandated to get degrees and should be educated appropriately; however, it is unfunded. We agree we need quality teachers. However, when our teachers get their degrees, it is difficult for us to keep them without the funding to provide a pay increase. If no monies are available to provide increases to these teachers, we will continue to lose our teachers. There is a need for increased funding for our programs as we continue to struggle with keeping staff. Not only teachers are affected but it affects others as well, such as bus drivers. Federal trustees are obliged to provide the resources we need. Our key wish is to balance our Tribal traditions with the education needed for our children. We want our children to get the best education possible. We cannot spend all our money on compliance, instead of services to the children."

Cedric Kuwaninvaya, Tribal Council Member, Hopi Tribe, Arizona, stated that the Hopi Tribes are non-gaming and are not rich. Twelve villages make up the Hopi Tribe, with 75 miles between the villages east to west. They have five Head Start centers and serve about 195 children. In terms of additional funding, they feel they need it because of the vast distances, for staff to earn their qualifications, and for professional development. They need funding to provide competitive wages to their staff. Once staff gain the requirements needed, they often move on because of low wages.

Head Start has been in the community for 40 years, and the facilities are aging. Funding is needed to set up permanent buildings and to provide transportation that can reach long distances with no paved roads. The Advisory Policy Council is in place to provide guidance and support. Parents and grandparents are involved in activities and they are needed. The Hopi members attended the

consultation to listen and learn, and to collaborate with OHS, as well as to share with other Tribes what they have implemented.

Ned Norris, Jr., Tribal Head, Tohono O'odham Nation, Arizona, explained that they have Tribes throughout Arizona as well as in Mexico. Although they are a gaming Tribe, they are not financially rich. Third-world conditions still exist in their community. Paved roads are still lacking, which makes it difficult to transport children and the elderly. Current population is 28,000, with a population growth of about 26%, compared to 23% for the State of Arizona.

Head Start programs are successful, Mr. Norris stated. To improve the education system, they have an obligation to develop an administrative plan. Their Tribe has targeted the 0 to 5 age group to try to address their needs. They must be prepared now, as they will assume the adult roles in the future. However, the pattern is that these children are lost between grade school and high school, and the Tribes are not sure why. At middle school, the children are losing interest. It seems that children are controlling the schools and have become disrespectful and use drugs.

Looking at the long-term impact in the Tribal communities, a holistic approach is needed to address the problem. Those children who are learning to drink at a young age or who are exposed to domestic violence learn it from adults. There must be a concerted effort to work out how to create success among the young people. This is the reality that must be faced. The Tribes need Head Start and the support of Head Start. The Tribes need funding from Head Start.

Other issues include: transportation, class size, and the regulations. The Tribes must gain support, understanding, and leadership to make the changes needed. The leadership of the Tribal Councils, who are elected, has taken an interest in this age group and in Head Start. They have matched Head Start funding to build three Head Start centers. "We have the facilities to expand," Mr. Norris said. "But the Tribes need Federal help and support to make the changes necessary to be able to address issues all Tribes face. It is the hope of the Hopi that we leave here with some sense of direction on where we must go and what we must do."

Rusty Gopher, Tribal Council Member, Rocky Boy Chippewa Cree Tribe, Montana, reported that they get little help from Tribal businesses, and they are not a gaming Tribe. Transportation needs are important as they have many dirt roads. Their facility is in need of improvement, and they share the problems that other Tribes have mentioned.

Quinton Roman-Nose, Designated Tribal Representative, Cheyenne and Arapaho Tribes, Oklahoma, brought up the following concerns:

- Tribal consultation procedures have not always been followed.
- Funds in the AIAN Branch have not always been utilized. For example, funds recaptured because of under-enrollment should be reallocated to other native programs, not reallocated for other purposes.
- Tribal colleges need to be funded to provide training to teachers where possible.
- With regard to background checks, there needs to be an explanation of the delay getting this information out to programs

- He noted requirements around eligibility and enrollment studies, the Program Performance Standards, and a report on Tribal Head Start facilities.
- He also referenced a National Congress of American Indians (NCAI broadcast) regarding governing board requirements.
- The final point was that Tribal programs should not stand separate from other Tribal education programs, but should be integrated/coordinated to the benefit of all Tribal children.

Richard Walema, Sr., Tribal Council Member, Hualapai Tribe, Arizona, noted that a hilltop Tribe can only get aid via helicopter. The Tribes are quite isolated. In other areas, with floods, there may need to be evacuations. There can also be a lot of damage done. Mr. Walema thanked OHS for allowing him to sit in on these consultations.

Tony Collins, Tribal Council Member, Salt River Pima-Maricopa Indian Community, Arizona, expressed his thanks for the opportunity the consultation afforded for the Tribes and Federal leadership to discuss Tribal concerns.

Phyllis Antone, Designated Tribal Representative, Gila River Indian Community, Arizona, also extended her appreciation. She added that there was a lot of talk about changes. However, Tribes will need additional funding to make those changes happen. To meet the requirements, especially for teacher degrees, the Tribes will need additional monies. The process for getting degrees becomes difficult when Tribes are more isolated. Villages and Tribes must be considered. She requested that, for future program changes, Tribal nations be included in the deliberations sooner. She also encouraged OHS to have Tribal participation from all geographic areas.

Albert Pablo, Designated Tribal Representative, Gila River Indian Community, Arizona, said he looked forward to working closely with OHS and thanked them for coming to Phoenix.

The Office of Head Start received the following written testimony:

Written testimony from the Mississippi Band of Choctaw Indians

September 2, 2008

Patricia E. Brown, Acting Director Office of Head Start
Administration for Children and Families
1250 Maryland Avenue, SW
8th Floor
Washington, DC 20024

Dear Ms. Brown:

I am responding to your letter of July 18, 2008 that provides an opportunity for tribal leaders to provide input on the implementation of the Improving Head Start for School Readiness Act of 2007. Since I will

not be able to attend the Consultation Session in Phoenix on September 11, 2008, I am providing written input.

The new Head Start for School Readiness Act of 2007 states that by the year 2013 fifty percent of all Head Start teachers and education coordinators must have a bachelor's degree in early childhood education. It states further that all teacher assistants must have an associate's degree. I agree that teachers need to be better educated in order to provide the quality education our children need. The problem we face at Choctaw is with the salary scale that we have in place.

In order for us to be able to attract and retain teachers with a bachelor's degree, salaries on the reservation must be competitive with local schools located in neighboring office reservation communities. The starting salary for a teacher in the Choctaw Head Start program is \$24,976 per year, The basic starting salary for a teacher in the, public school systems is \$33,500. Further, the teacher in the Choctaw Head Start program works on a 12-month basis while teachers in the public schools are on a ten-month contract. Unless we close the pay gap, it will be almost impossible to retain teachers with a bachelor's degree.

We need to make sure that Head Start administrators in Washington request the Appropriations Committees to increase funding for us to increase salaries for teachers with a bachelor's degree.

In addition, we have other questions.

- What will happen if we fail to meet the fifty percent quota by 2013?
- Will this affect our funding?
- Will there be any special assistance from Head Start that will encourage teachers to get their bachelor's degree?

We at Choctaw will make every effort to achieve the goals set by the Head Start for School Readiness Act of 2007. We will need additional financial resources to retain those teachers with a bachelor's degree and reward those assistants who get an associate's degree.

Best regards,

Miko Beasley Denson

Written Testimony from the Colorado River Indian Tribes

Colorado River Indian Tribes
Colorado River Indian Reservation
Route 1, Box 23-B
Parker, AZ 85344

October 2, 2008

Patricia E. Brown, Acting Director Administration for Children and Families
Office of Head Start
1250 Maryland Avenue, SW, 8th Floor
Washington, DC 20024

Dear Ms. Brown:

The Colorado River Indian Tribes have been the grantee of the Head Start Program for the 41 years of the program with a current enrollment at 183 children between the ages of three and four. Over the years, thousands of children and their parents have benefited from full array of services that the Head Start Program is able to provide to them.

The Colorado River Indian Tribes Head Start Program is unique in regards to this as it is not just a tribal program but it serves the residents of the area who qualify for services based on the guideline of the Head Start Grant. The Town of Parker is located within the boundaries of the Colorado River Indian Tribes and is within the county of La Paz. Residents of the community have always depended on the Head Start Program to deliver the comprehensive child development services due to this type of services are non existent. The community is located three hours driving distance from any large city where specialized health services are available. Therefore, the program has been responsible for ensuring the needs of the young child is being met and has been able to access them to the specialized health services for the family and child.

With the present economy the Colorado River Indian Tribes community continues to be designated as an enterprise zone by the State of Arizona, this is due to the depressed economic conditions of La Paz County's low per capita income and the poverty level. Since there are few job openings in the rural tribal community, and the rate is based only on those who are looking for work, the 2007 unemployment rate for the community is 6.6%.

The 2007 Head Start Act has a great impact not only on the tribal community but will also impact the non Indian community. Specifically of concern is the Section 642 (c)(1)(B)(v) which states "The governing body must have certain type of expertise on their governing body that includes fiscal management, early childhood education and development and a licensed attorney, however, tribes may be excepted since exceptions should be made for members of public entities when they are elected or politically appointed."

Under Section 648(g)(1)(D) "Tribal Colleges and Universities will provide activities to upgrade the skills and qualifications of educational personnel to meet the professional standards: EHS teachers shall have a CDA by 9/30/2010;50% of teachers nationwide will have BA or advanced degree by 9./30/2013;All Ed Coordinators will have a BA or higher by 9/30/2013;All teacher assistants will have at least a CDA by 9/30/2013 or enrolled in a program for AA or higher or a CDA program that will be completed in two years."

These educational requirements leave programs at a vulnerable state to the possibility of losing staff to a job that pays the value of the educational level. With the act there is no increase being addressed to compensate for the additional educational requirement. The 50% requirement of teacher education level nation wide could greatly impact a program that is already above that standard and considering the incumbency of educators with the Colorado River Indian Tribes.

These are the most pressing concerns considering the new requirements that are being put on the tribal Head Start Programs. Additionally, we must not forget that the funding level has remained the same for a

number of years and ties the hands of the program having to continue to operate at the same level of funding and not being compensated for the economic impact.

Consultation and collaboration among relevant programs was critical prior to such a late date of the implementation of the 2007 Head Start Act.

Sincerely,
Daniel Eddy, Jr. Tribal Chairman

Written Testimony from the Gila River Indian Community

Good Morning/Afternoon. I am honored to be here today to discuss with you the needs of the children and families served by the Gila River Indian Community Head Start Program. Also with me today are Education Standing Committee Member-at-Large, Ms. Phyllis Antone, Ms. Pat Foster, Head Start Director and Mr. James Sundust, Culture Coordinator for our Head Start Program. Together, we have discussed how we can address the *Improving Head Start for School Readiness Act of 2007* and how the many regulations will impact our Head Start Program. While we have dedicated Head Start Staff, parents and Community volunteers, we will need additional federal funds and OHS support to provide a broad range of services to our children, as required by this new Act.

I would like to tell you a little about our Community. The Gila River Indian Community traces its roots to the Hohokam. Based archeological findings, this group of prehistoric Indians migrated to the region around 300 A.D. and farmed along the Gila River Basin. The Hohokam is recognized for starting a series of irrigation canals through out the area. As farmers along the Gila River, they needed to find ways to supply water to areas further away from the Gila River. They did so with an elaborate system of canals dug by hand with wood and stone tools, with the dirt being carried away by the women carrying large baskets.

The Gila River Indian Community is located on 372,000 acres, with a 600 square mile boundary in the south central Arizona, south of Phoenix, Tempe and Chandler in Maricopa and Pinal Counties. The reservation was established by an Act of Congress in 1859. Gila River Indian Community, whose members are of the Akimel O'Odham and Pee Posh Tribes, consists of seven Community Districts. The Tribal Government offices, Administration offices and Departments are located in Sacaton, in the southwestern area of the reservation. These offices and Departments serve residents throughout all of the Districts, while local District administrative offices are located within each seven Districts.

Based on the latest official numbers from our Enrollment Office there are 18,263 enrolled Community members of the Gila River Indian Community. Based on current enrollment data, the number of the Community Members living on the reservation is 11,370. It is proposed that the reason 38% of our people live off the reservation is out-migration to surrounding cities, due to the lack of employment opportunities on the reservation

From enrollment figures it has been determined that there are 467 children between the ages of 0-2 and 762 children between the ages of 3-5, for a total of 1,229 age-eligible children who are enrolled members of the Gila River Indian Community. The majority of these children are also Head Start income eligible. The Gila River Health Corporation has found that birth rates in the community are in comparison to the State of Arizona rates. The statistics for the State of Arizona are 6.1 per 100 births to mothers under the age of 18 years; the birth rate between the ages of 10-17 mother in our Community is 24.2 births per 1000 women and 88.2 births per 1,000 women 18 to 45 years. According to the tribal demographic records, the majority of Tribal members are younger than 25, and the median age is 21.9 with 46.3% under 18 compared to the State of Arizona average of 25.7% under age 18.

According to current statistics, 49.2% of our families have incomes below the poverty guidelines and of those families, 52.9% are families with female head of household with no husband present. Based on results from the current community assessment, 95% of respondents receive federal and state assistance in the form of TANF, food stamps and insurance coverage.

*History of Gila River Head Start

The Gila River Head Start Program received its initial federal funds in 1965. As the national Head Start program has grown, so has the Gila River Head Start Program. This program now consists of eleven (11) classrooms and provides services to 203 children and their families. This program has Head Start Center classrooms on District 3, District 4, District 5, and District 6, of the seven Community Districts. Children of families living in District 2 are included in the District 6 center. Both Districts 2 and District 7 children will continue to be apart of these two (2) Center's classrooms until additional Center arrangements are possible. This program is dedicated to providing comprehensive services and high quality learning experiences for the children of our Community. Based on the number of Community children ages 0-5 and information from the current Community Survey it has already been discussed by the Education Standing Committee and Policy Council that we should provide Early Head Start services for our families. By doing so, this Program, while working in cooperation with the community, will be a strong partner in support of the family growth and educational advancement of children and adults alike.

With the changes in the Welfare Reform Act and the Gila River Indian Community's encouragement to become self-reliant, more parents are entering the labor market. However, poverty remains pervasive throughout this Community. Information from the official Community Survey shows that the average annual income is \$13,592 and the median income is \$17,635, both are based on a family of four, which is our average family size; 83% of our households have incomes below \$24,130. According to the most recent Community data 59% of our families with children under the age of 5 live below poverty level. That number increases to 66% when female householders with no husband present are taken into account. In addition, 53% of grandparents are responsible for children under the age of 18, when those grandparents are living within that household.

While business continued to develop in the Community, many of the opportunities for employment are those of low paying jobs. Of the population 16 years of age or over, 46% are in the labor force, 35% of those are currently employed and 11% of those are currently unemployed: 54% of this age group is not in the labor force. Of those employed, 52% are in service and office occupations, often having the lowest entry wage of all jobs. The unemployment rate for the Community is listed at 25.5%. For families with children under the ages of six (6), the unemployment rate is 44.6%

The goal of creating more jobs has led to a need for higher levels of education, leading to the long term goal of self-reliant families. Unfortunately, the level of graduation is at 12%, and students dropping out of school and truancy continue to be a challenge and concern; of those reporting, 13% of our Community member have less than a ninth grade education, 35% have between ninth through twelfth grade with no diploma: for a total of 48% without a diploma or GED, and 34% have a high school diploma or GED.

The Gila River Head Start Program has classrooms within four (4) of the seven (7) Community Districts; District 3, District 4, District 5, and District 6; and one(1) private three(3) public elementary schools serve these same Districts. According to the Arizona Department of Education Food Program, statistics show that 99% of our Head Start families are eligible for the free and reduced lunch program, which is an additional indicator of poverty.

While we appreciate the opportunity to meet here in Phoenix with you, we ask that you respect our sovereign status as we work together to find ways to meet these requirements. We feel that we know our families, our Community, our resources and we request your flexibility in thinking and support so we can meet the needs of our children and families. There was short notice of these Tribal Consultations for all of Indian Country and this made it difficult for many programs to attend. The cost of travel is prohibitive for many of us and while the Regulations state that the Consultation are to be held in each region with Indian Head Start and Early Head Start programs, that wasn't done, What will happen after these Consultations and how will the information We have shared with you be used to benefit all of Indian Country?

I will address several areas of concern that the Gila River Indian Community has regarding the Act. Our first area of concern is the new requirements regarding the composition of the Governing Body. As you know, our Governing body is our Tribal Council, made up of elected officials from each District. We are from varied professional backgrounds and bring to the Tribal Council many years of experience. Everyday, we make sound financial and legal decisions regarding the entire Community and can consult with employees in these fields, as well as Early Childhood. Why should we be required to hire a consultant to help us make informed decisions regarding our Head Start Program? We have the information we need and are able to make informed decisions, consultants don't have this information.

This is just one example where we expect you/OHS to respect for our sovereign status and we believe that SEC.642(c) (v) clearly states the exception to this requirement for Tribal governments.

Very recently, several Program Instructions have been released by OHS that have caused concern, not only throughout Indian Country, but for all Grantees. It seems that these instructions come to the Grantees without careful thought and consideration for the Grantees. It is my understanding the latest one, "Timelines for Filling Vacancies in Enrollment Slots" has now been called back and will be reissued after further study and clarification. This seems much like the urgency previously stated about implementing the NRS; and we know what happened to that. Why is there such a sudden urgency to put out these instructions, most of which don't make good sense, but cause much extra work for our staff? Has there been such a breakdown in our trust relationship that every little thing now has to be documented, monitored and verified in additional ways? Where is the OHS cooperation and support for Grantees who are having difficulties? This seems to be more of a "punishment" approach and that you/OHS are trying to catch Grantees in something. That is not the way to build trust and cooperation and certainly not the way in which the government-to-government agreements are meant to work.

Indian Program remaining funds allocation is cited in ESC.640 (a) (3). We ask that all funds allocated for Indian expansions are actually received by Indian Grantees and not made available to all Grantees, and in the full amount as specified, \$10,000,000 if remaining or 5% of remaining funds if the full \$10,000,000 does not remain, and not be reduced as in the past. COLA should also be clearly defined in this section, so that Indian Grantees receive the same COLA allocation as all the other Grantees; along with full expansion funds, we will be able to increase enrollment, convert part-day to full-day slots, add Early Head Start, and hire additional staff at competitive wages to meet the needs of the community. It is important to understand that it takes time to implement such an undertaking and OHS must be realistic and allow sufficient time for these new plans to be in place. Regulations and guidance should state clearly the OHS expectations and requirements.

With regard to SEC.649 (k); we ask that culture and traditions be respected regarding research about all Indian Head Start programs. It is important that OHS work closely with the National Indian Head Start Directors Association and take their recommendations regarding culturally relevant curriculum, developmental and assessment tools. We also ask that information gathered from these studies be shared with all Indian Head Start Grantees before being published or used as Information Memorandum(IM) or Program Instructions(PI) for programs. These are our children and it is our right to know and to approve of published materials; this will show that OHS adheres to the trust responsibility to AI/AN. We believe research will show that funding allocations will be proved to be well below the actual cost per child to provide even minimum quality services in Indian Country. Additional funds should be allocated to address this discrepancy.

As I stated previously, and will address with SEC. 645(d)(3), there is great need for the Gila River Head Start program to provide Early Head Start program to provide Early Head Start services to our families. Every day, in every Center, we have families asking for Head Start for their infants and toddlers. They want to enroll now to begin receiving the benefits they see from Head Start; yet, we have no place for them. It is crucial that Indian Grantees have enough flexibility to implement programs that meet our needs and to maximize these funds. This would allow for transferring slots throughout the year and would ensure that base funding would not be reduced in future grant years. Will separate designation be given to Head Start funds and Early Head Start funds decrease the

funded enrollment number, and therefore the funding allocation? Because the cost of providing Early Head Start services, it is crucial that our base funding not be decreased, rather it should be increased for the number of Early Head Start children served. Clear guidance about conversion and expansion is requested regarding this regulation.

Program quality is important to our Community and we feel that we provide a high quality program that meets our needs and expectations. We agree with the intent of the new Act and that OHS will work with all programs during the years between reviews and not just the review year. We hope to see that put into practice and not just words. This seems to be a way continuously improve programs and be such a “gotcha” approach as in the past. This can be a way in which we work together to really meet the need of our children and families. Gila River Head Start, along with many Indian Head Start programs has great need for new or renovated facilities, yet do not have funds to build facilities that will be in compliance with review requirements. We need your assistance of additional “Supplement Funds” to bring our current facilities up to compliance standards or to build new facilities when current facilities are in such shape that they can’t be renovated. Remember, many of our buildings are former BIA “left behind” buildings or old modular buildings from the past. Our facilities may not be everyone’s ideal, but we keep them as clean and safe as we can. We request On-site Reviews be conducted respectfully, are culturally relevant, and that Review Teams include current OHS and Grantee program staff. We also recommend that additional efforts are made to recruit current and former Indian Head Start staff throughout Indian Country to be members on every Indian Head Start On-Site Review.

Another way to ensure high quality program in Indian Country is to hire qualified American Indian and Alaska Natives at the AI/ANPB (American Indian/Alaska Native Program Bureau). Where is our representation there? Who speaks for us at the highest level of OHS? Where are our “Friends” of Indian Grantees? So many times in recent years, we have had to work with persons who have very little knowledge of Head Start and no knowledge of Indian Head Start programs, or for that matter of Native Americans, and persons who have relevant experience in working with Indian programs who would be able to work at the national level; a benefit for all of us. Please increase your efforts to recruit and hire these persons.

The additional Native American staff at the AI/ANPB may be able to provide guidance and assistance to Indian programs as we struggle to implement all of the unfunded mandates required by the Regulations. Throughout Indian Country it is difficult to hire qualified staff, provide salaries and benefits comparable to larger population areas, and still have resources to create or provide higher education opportunities for staff. If we are required to add the cost of consultants for the Governing Body on top of all these other costs, there will be little money left for the children. You have also taken away the In-Kind services contribution for providing bus transportation to our children. Most of our programs are in rural and remote locations; the majority of our parents would not be able to volunteer. With the extremely high cost of fuel, maintenance and repair, using bus transportation as an In-Kind requirement was a way for many of us to meet our funding requirements; you took that away and our programs have been hurt by that.

Isn't Head Start for and about young children? Our children deserve better than this; they deserve the very best possible.

The Gila River Indian Community has made a commitment to language preservation and Head Start program, under the guidance of our Elders, provide language and culture classes to children, families and staff. Because each Nation and Tribe is unique, it must be clearly written in the Regulations that our culture curriculum and our method of implementation is exempt from the research based requirement and not used as part of the Head Start research required by the Act.

In general, we ask that OHS provide clear guidance for and clarification of the Act. There are many sections that are unclear and that we feel should be more explicit on the government-to-government relationships. Some of these sections involve the Designation Renewal System, Tribal Relationships with State Collaboration Office and the National Indian Collaboration Office, the National Indian/TA system, Redistribution of Recovered Funds, Collaboration with HIS for Health and Mental Health Services, and Under-enrollment. We feel that all of these areas should be thoroughly reviewed so they can be clearly written in the regulations.

In conclusion, Gila River Indian Community intends to fully implement the requirements of the Improving Head Start for School Readiness Act of 2007 and is committed to providing the best possible, high quality services to our children and our Community. However, the unfunded mandates and current federal funding levels make this extremely difficult. Based on information in the Kid's Share 2008: How Children Fare in the Federal Budget, domestic spending will increase by \$771 billion over the next decade and programs for children will receive only \$55 billion or 7.1% of that increase under current law. The level of federal funding for children's programs will have decreased from 16.2% in 2007 to 13.8 by 2018. With stagnant federal funding, local budget constraints, and ever increasing, escalating costs, it will be difficult to maintain our current level of services, let alone increase our service delivery and provide even higher quality services to our children.

Yet, we will not abandon our highest hopes for our children. We are resourceful and hard working people and will continue to provide the best we can for our children. Our Community cannot meet all of these federal mandates without increased federal assistance. By working together to find ways to combine resources, we can do what's right for our most precious resource, our children. We ask that OHS recognize and respect the sovereign status of the Gila River Indian Community and work with us in a more flexible and cooperative manner as we strive to provide for our children.

Thank you for your attention to our concerns and for the opportunity to speak with you about them today.

Written Testimony from White Earth Reservation Tribal Council

September 15, 2008

TO: Renee Perthius
FR: Erma Vizenor, Chairwoman

I would like to take this opportunity to thank you for allowing us to submit written testimony in regard to the newly revised Head Start Act.

It is important to maintain effective communication. We have outlined areas of concern in the attachments and hope they will be of use in providing thoughtful discussion and decision making for Head Start.

Enclosed you will find the testimony from other programs that we collaborate with, to ensure quality services to our children and families.

Written Testimony

The White Earth Reservation Tribal Council is the governing body of the White Earth Reservation Head Start Programs. Our Tribal Head Start Programs consist of both regular and early head start programming with combined federal and state resources; we serve 210 children annually with our nine centers, home visiting options and two family child care sites. On behalf of the families and children we serve, we are submitting this written testimony in response to the new Head Start legislation and ensuing performance standards.

Income Guidelines: Head Start must be made available for all children; income guidelines restricting participation by our youngest are unfair. While a large percentage of our Tribal population lives in poverty, we believe we must be able to provide the quality head start services to all children and families. Our Tribal Government continues to work on eliminating poverty on the White Earth Reservation through various initiatives. The current Head Start program guidelines discriminate against those families who have worked hard at getting out of poverty. In order to succeed, these families need continued support by our programs rather than being shut out. We propose that the Head Start income guidelines be eliminated.

Funding: Expansion funding must be made available to programs in the near future. We request you to consider carefully defining expansion to include allowances for increasing enrollment as well as full-day and extended-year options. We also request the expansion of Early Head Start and Early Head Start center options, and to make the process for moving children and enrollment slots from one program into the other easy. We have an Early Head Start program along with our regular Head Start, and due to the number of children not being served by either, we have identified a need for expansion funding in both areas.

The Head Start program provides valuable services to our families, and in order for us to continue servicing at this level, increased funding must be made available to off-set daily operations. The White Earth Reservation is rural and must provide transportation in order to maintain attendance and enrollment. The cost of transportation, heating, food service and other staples continues to increase. The Office of Head Start must support the increased costs.

Funding must also increase to meet the new requirements of the Head Start Act (ex. Governing Body composition or the retention of the family child care providers under new regulations).

Family Child Care Option: The recent final rule regarding the family child care option must be reconsidered. White Earth has 10 children enrolled in the family childcare option; this collaboration has not worked well for Head Start, but has also provided a valuable option and choice for parents. The quality of care in the (child care) centers has increased with the implementation of scheduled directed activities as well as the support provided by Head Start program staff. By severely restricting the number of children allowed to be enrolled in the childcare home under the family child care option, the option has become financially impossible for our providers who have already indicated they would have to drop Head Start services. If they choose to remain with Head Start, an increased hardship would be placed on reservation families who continually struggle to find quality licensed care.

While we are constantly urged to forge new collaborations, this restriction, along with many others, make the Head Start programs very difficult to collaborate with. We request that the enrollment for the family child care option mirror the state or tribal licensing requirement, which ever is appropriate for that area.

Governing Body: Another area of concern revolves around the required composition of the governing body; according to the new Head Start Act, each governing body must include a lawyer, early childhood professional and accountant. As elected officials for our tribal government, we have no way to restrict the election process to ensure that these required provisions are met. The regulations have an exception for elected public officials which must be amended to include tribal government officials.

The Act also states that we must hire outside consultants, as an elected board, to fit the roles of the lawyer, accountant, or early childhood professional in lieu of the elected official. The White Earth Tribal Council employs highly qualified individuals in each of these areas and does not agree with the idea of being forced to hire external consultants when we have the internal capacity to fulfill that requirement.

Training and Technical Assistance: We request the Office of Head Start to strengthen the capacity of the tribal training and technical assistance. Our current provider is knowledgeable and helpful; however, her service area is too large for her to be able to provide the quality and quantity of T/TA that we would like.

Monitoring: Head Start is one of the most monitored and regulated programs, ever. We are forced to comply with a multitude of regulations, memorandums, and instructions. And, for the most part, we are compliant as are most programs.

We do not agree with the new RMM telephone monitoring system the Office of Head Start has put in place. We have been told that it is not monitoring; however, when Tribal Council, policy council, Head Start management, and federal staff, including our programs specialist, grant specialist, regional and/or federal director, along with the T/TA provider are expected to attend and participate in the telephone conference, and when an action plan may be initiated with timelines, we consider that monitoring.

The information required for the telephone meetings is already in your offices in the form of PIR data, T/TA reports, enrollment reports, financial reports, and grants. If further information is needed or questioned, you should rely on the respective program specialist to inquire and follow-through. The Office of Head Start must have a process to get the information you need from the specialists involved. If not, we request that you set up a monthly format where they report to you on issues identified much the same way that the Head Start program now must report monthly to us. We request that this new monitoring be eliminated.

Consultation: Finally, the planning for this consultation was not sufficient to allow thoughtful participation by many tribal entities. As of today, we estimate that less than 25% of the Tribes will participate in the consultations; reasons for the low participation reflect the timeline and scheduled locations. The Head Start Act states that “the Secretary shall conduct an annual consultation in each affected Head Start region, with tribal governments operating Head Start including Early Head Start programs. There are 10 regions for Tribal Head Start Programs, many more than the three scheduled consultation locations. The locations of the consultations must be more accessible to all Tribal organizations.

The Federal Register, Vol. 73, No. 120 also states that the consultation session agenda are available by contacting the Acting Director, Office of Head Start. Our staff requested a copy of the agenda one working day before the first consultation. The response stated that the agenda was fully prepared and would be distributed at the beginning of the meeting. This does not allow for Tribes to fully prepare and participate in consultations and is not acceptable.

While we recognize that process may be financially straining to your operating budget, we have been experiencing strains to our budgets as well. However, we are held to standards that force compliance. The Office of Head Start must also be compliant by allowing for a more meaningful consultation and broader participation by tribes.

TRIBAL CONSULTATION MEETING

September 11, 2008
Phoenix, Arizona

AGENDA

8:30 A.M.

TRIBAL OPENING

WELCOME & INTRODUCTIONS

Patricia Brown, Acting Director, Office of Head Start (OHS)

TRIBAL STATEMENTS

Patricia Brown, Facilitator

REGIONAL DISCUSSION

*Renée Perthuis, Director, Regional Operations Division, and Acting Regional Program Manager,
American Indian/Alaska Native Program Branch, OHS*

HEAD START REAUTHORIZATION

Craig Turner, Director, Policy and Budget Division, OHS

TRIBAL INPUT

PROGRAM PERFORMANCE STANDARDS & RESEARCH

Amanda Bryans, Director, Educational Development and Partnerships Division, OHS

TRIBAL INPUT

MONITORING & TECHNICAL ASSISTANCE

Ann Linehan, Director, Quality Assurance Division, OHS

TRIBAL INPUT

5:00 P.M.

WRAP UP & ADJOURNMENT

Patricia Brown, Facilitator

Improving Head Start for School Readiness Act of 2007

P.L. 110-134

Craig Turner
Director of Policy and Budget Division
Office of Head Start

Grantee Designation

- Grants will be for a 5-year period
- A review panel appointed by the Secretary will make recommendations on the implementation of a new system for re-designation of grantees.
- 18-36 month time frame for implementation

Grantee Designation (continued)

- If an AIAN grantee is found to not be delivering high-quality services, the tribe and HHS will establish a plan to improve program quality. This plan must be implemented within a 6-month period.
- If after 6 months the grantee is still not delivering high-quality services, there will be a competition for the Head Start grant.
- A non-Indian Head Start agency may not be funded to operate a Head Start program unless there is no Indian Head Start agency in the community. If that is the case, the non-Indian agency would operate only until an Indian agency became available.

3

Funding Allocation

All grantees must get the prior year's base funding level unless appropriation is less than the prior year.

If there are increased funds:

- T/TA is 2 ½% to 3% of the increase
- Grantees get COLA equal to the prior year increase in CPIU, if there are sufficient funds
- **Indian and migrant programs get \$10 million, or if a full COLA is not possible, 5% of any increase**
- **Special Expansion to AIAN and MSHS is capped at \$50 million for each**
- **AIAN grantees get 3% of expansion funds in future years**

4

Funding Allocation (continued)

Of any remaining funds:

- **Quality Improvement** – 40% (45%)
- **Expansion** – 45% (55%)
 - Split equally between Head Start and EHS
- **State Advisory Councils** – 15%

5

Homeless Children

- Homeless children are categorically for Head Start
- OHS will issue regulations regarding the participation and prioritization of homeless children in Head Start programs

6

Children Above Poverty Line

- Grantees may serve up to 35% of their enrollment with children whose incomes are between 100% to 135% of poverty. (This is in addition to the current 10% over-income.)
- **AIAN grantees can continue, in certain circumstances, to serve up to 49% of their enrollment from children not meeting the income eligibility criteria.**
- Grantees doing so must demonstrate they have met the needs of the low-income population.

7

Enrollment

- Grantees can propose to convert current Head Start slots to EHS slots.
- Grantees can propose to convert current part-day slots to full-day slots.
- Grantees can propose enrollment reductions.
- Grantees are to maintain “an active waiting list”.
- **AIAN grantees who run HS and EHS programs may re-allocate funds between HS and EHS.**

8

Children With Disabilities

- The current regulatory requirement that 10% of enrolled children has been modified and incorporated into law.
- 10% of enrolled children (not enrollment opportunities) must be for children with disabilities
- Grantees may receive a waiver, but only for up to 3 years.

9

Curricula

- All curricula must be based on scientifically valid research and be age and developmentally appropriate.

10

Standards/Measures

- OHS to review and, as appropriate, revise the Performance Standards.
- OHS to provide guidance to grantees on the use of scientifically based measures.

11

Monitoring

- Teams do not have to be led by federal team leaders.
- Reviews are to use a valid and reliable research-based observational instrument to assess classroom quality.
- The time period for correcting non-compliance findings is 120 days.
- Program strengths are to be included in the monitoring report.

12

Consultation

- Annual consultation in each region with tribal governments
- Consultation with tribes as part of developing any revisions to the Performance Standards

13

Collaboration/Coordination

- Grantees must enter into a MOU with the agency in its community (if any) that administers state pre-K.
- Grantees must collaborate with LEAs to ensure an orderly transition from Head Start to kindergarten.
- Grantees are to conduct community outreach to “generate support and leverage resources...”

14

Collaboration (continued)

- New roles have been assigned to the State Collaboration Directors.
- **A collaboration grant must be funded for AIAN programs.**

15

State Advisory Councils

- Each governor to establish a State Advisory Council. **Governors should, to the extent possible, include a representative of the AIAN programs in the state.**

16

Staff Qualifications

- By 9/30/2010: 100% of EHS teachers with CDA
- By 9/30/2011: 100% of teachers with AA*
- By 9/30/2013:
 - **100% of Ed. Coordinators with BA**
 - **50% of teachers with BA**
 - **100% of teacher assistants with CDA***

*waivers may be granted

17

T/TA

- T/TA is 2½% to 3% of the total Head Start appropriation
 - At least 50% of T/TA funds go directly to grantees.
 - At least 25% of T/TA funds are to be used for a state-based T/TA system.
 - **AIAN grantees will be served by a region-wide T/TA system.**

18

T/TA (continued)

T/TA priorities now include:

- training and career development needs of staff related to literacy activities & parent involvement,
- prevention of childhood obesity,
- improving services to homeless children,
- improving services to LEP children,
- increasing family literacy and parenting skills,
- meeting the needs of rural families, etc.

19

T/TA Tribal Colleges

- T/TA funds may be used to fund tribal colleges that would use these funds to increase the number of Head Start staff with degrees in early childhood education or related fields.
- Tribal Colleges could also be funded to develop curricula that would help Head Start staff develop the skills and expertise needed to teach in programs serving large numbers of Indian children, including programs concerning tribal culture and language.

20

Staff Training

- All teachers must attend at least 15 hours of professional development each year.
- Each agency must develop a professional development plan for all full-time staff.
- Teachers that receive financial assistance for college must agree to work in Head Start for three years or repay assistance.

21

Grantee Management

- Agencies are to develop procedures for on-going monitoring.
- Each agency is to conduct a comprehensive self-assessment of its effectiveness and progress in meeting program goals.
- Improvement plans are required for programs needing improvement.
- New requirements for governing board membership.
- Specific functions are given to both the Board and the Policy Council.

22

Grantee Reports

- Annual reports to OHS on:
 - Administrative expenses
 - Progress in meeting teacher degree requirements
 - Program improvement plan to strengthen weaknesses identified in the self assessment
 - Demographics, outreach, enrollment and other practices, if serving additional children up to 130% of poverty
- A copy of its audit management letter and any audit findings related to Head Start to OHS
- Monthly enrollment reports to OHS

23

Annual Report to Public

- Grantees are required to make an annual report on program operations available to the public.
- The report must include information on funding sources, budget, enrollment, monitoring reviews, audits, medical and dental screenings, parent involvement activities, and agency efforts to prepare children for school and any other information required by HHS.

24

Under-Enrollment

- Grantees will report monthly on enrollment.
- On a semi-annual basis OHS shall:
 - determine which agencies are under-enrolled,
 - develop a plan for reducing or eliminating under-enrollment with such agencies, and
 - provide technical assistance.
- If after 12 months of TA, an agency is less than 97% enrolled, OHS may recapture or reduce the base grant.

25

Studies

- A study of limited English proficient children and their families
- **A study of the unmet need for American Indian and migrant/seasonal children**
- A study of Head Start programs' preparedness to deal with emergencies

26

Centers of Excellence

- OHS to establish up to 200 Centers of Excellence (subject to appropriation of funds).

27



Head Start Program Performance Standards

Mile Markers to Quality

History

What are Head Start Performance Standards?

What is the historical impact of the Standards?

Current Configuration

Part 1304-Program Performance Standards for the Operation of Head Start Programs by Grantee and Delegate Agencies

Current Configuration

Subparts:

- A - **General** (purpose and scope, effective date, definitions)
 - B - **Early Childhood Development and Health Services**
(health, education, development, safety, nutrition, mental health)
 - C - **Family and Community Partnerships**
 - D - **Program Design and Management** (governance, systems and procedures, human resources, facilities, materials and equipment)
 - E - **Implementation and Enforcement** (deficiencies and quality improvement plans, noncompliance)
-

Part 1305 – Eligibility, Recruitment, Selection, Enrollment, and Attendance in Head Start

- Purpose and scope
 - Definitions
 - Community strengths and needs
 - Age and income eligibility-AIAN exception
 - Recruitment
 - Selection
 - Enrollment
 - Attendance
 - Policy of fees
 - Compliance
-

Part 1306- Head Start Staffing Requirements and Program Options

Subparts:

- **A-General** (purpose and scope, effective dates, definitions)
 - **B-Head Start Program Staffing Requirements** (staffing patterns, qualification requirements, volunteers, training)
 - **C-Program Options** (provision of comprehensive services, selecting an option, center based, home-based, combination, additional program options)
-

Part 1308- Head Start Program Performance Standards on Services For Children With Disabilities

- **Subpart A- General** (purpose, scope, definitions)
 - **Subpart B –Disabilities Service Plan** (purpose and scope of plan)
 - **Subpart C- Social Services Performance Standards** (recruitment and enrollment of children with disabilities)
 - **Subpart D- Health Services Performance Standards** (assessment of children, eligibility criteria for specific diagnoses)
 - **Subpart E- Education Performance Standards** (IEPs)
 - **Subpart F- Nutrition Performance Standards**
 - **Subpart G- Parent Involvement Performance Standards** (parent involvement and nutrition)
-

OHS Experience

- Monitoring
 - Policy Clarifications
 - Research
 - Anecdotes
-

Teacher Child Interaction

- Valid, Reliable measure required by statute for monitoring
 - Essential element of professional development
-

Parameters

- Provide feedback about impact of current regulations on Tribal Head Start programs
 - Offer recommended changes
 - Regulations will not include guidance
-

Process

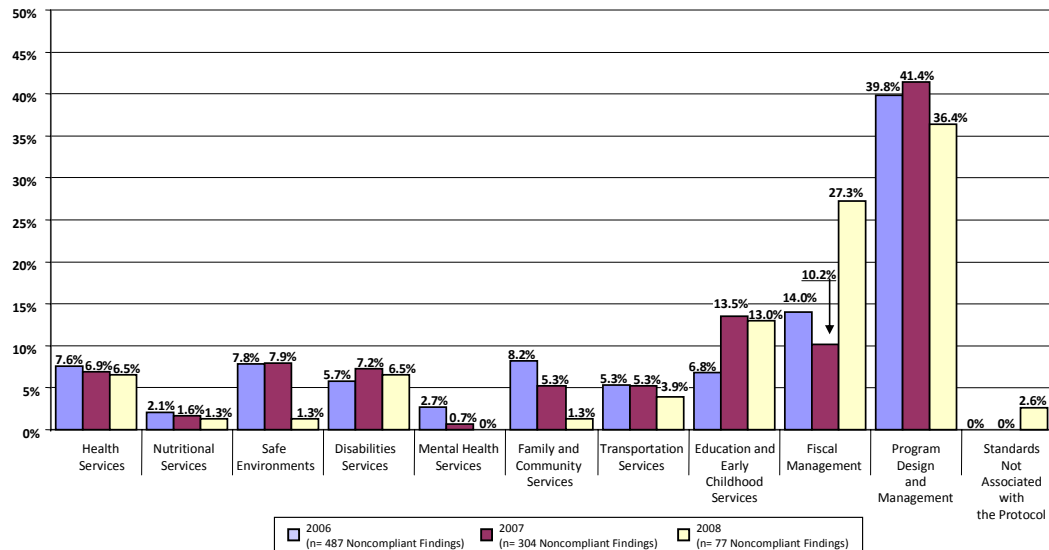
- Statute provides authority to regulate
 - OHS consults with experts
 - Draft regulations are developed
 - Notice of Proposed Rule Making is published in Federal Register
 - Public comments
 - OHS responds via publication of final rule
-

Thanks to you . . .

Head Start continues to be a leader in
early education for all children.

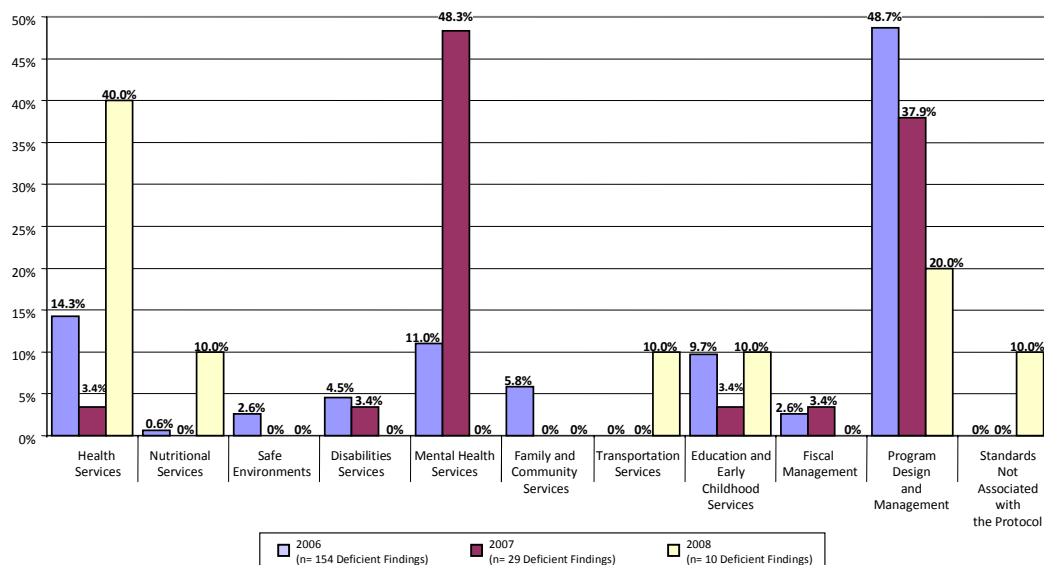
AI/AN FY 2006 to FY 2008 Noncompliant Findings by Protocol Section

EXHIBIT 9: FY 2006 to FY 2008 AI/AN
NONCOMPLIANT FINDINGS BY PROTOCOL SECTION



AI/AN FY 2006 to FY 2008 Deficient Findings by Protocol Section

EXHIBIT 10: FY 2006 to FY 2008 AI/AN
DEFICIENT FINDINGS BY PROTOCOL SECTION



AI/AN vs. Nation—Most Frequently Cited Performance Standards, FY 2006 to FY 2008

EXHIBIT 11: MOST FREQUENTLY CITED STANDARDS IN FY 2006 TO FY 2008 TRIENNIAL/FIRST-YEAR REVIEWS

AI/AN GRANTEES

Rank	Performance Standard	Protocol Section	Protocol Subsection	Grantees with Citation (n=105)	
				n	%
1	1304.51(i)(2)	Program Design and Management	Ongoing Monitoring	28	26.7%
2	1304.20(b)(1)	Health Services	Providing Health Services	23	21.9%
3	A-133(320)(a)	Fiscal Management	Financial Reporting	21	20.0%
3	1310.21(a)	Education and Early Childhood Development Services	Approach to Education and Early Childhood Development Services	21	20.0%
3	1304.24(a)(2)	Mental Health Services	Implementation of Mental Health Services	21	20.0%
6	1304.52(j)(1)	Program Design and Management	Human Resources	18	17.1%
6	1304.51(i)(1)	Program Design and Management	Self-Assessment	18	17.1%
8	1304.51(g)	Program Design and Management	Record-Keeping and Reporting	16	15.2%
8	1305.7(b)	Program Design and Management	Eligibility, Enrollment, and Attendance	16	15.2%
10	1304.24(a)(3)(i)	Mental Health Services	Implementation of Mental Health Services	15	14.3%
10	1304.52(i)	Program Design and Management	Human Resources	15	14.3%

GRANTEES NATIONWIDE

Rank	Performance Standard	Protocol Section	Protocol Subsection	Grantees with Citation (n=1008)	
				n	%
1	1304.51(i)(2)	Program Design and Management	Ongoing Monitoring	157	15.6%
2	1304.53(a)(7)	Safe Environments	Facilities, Materials, and Equipment	121	12.0%
3	1310.21(a)	Education and Early Childhood Development Services	Approach to Education and Early Childhood Development Services	116	11.5%
4	1304.20(b)(1)	Health Services	Providing Health Services	111	11.0%
5	1305.3(c)(3)	Program Design and Management	Planning	101	10.0%
6	1304.51(g)	Program Design and Management	Record-Keeping and Reporting	92	9.1%
7	1304.53(a)(10)(x)	Safe Environments	Facilities, Materials, and Equipment	85	8.4%
8	1304.52(j)(1)	Program Design and Management	Human Resources	82	8.1%
9	1304.52(i)	Program Design and Management	Human Resources	76	7.5%
10	1305.7(b)	Program Design and Management	Eligibility, Enrollment, and Attendance	74	7.3%

Note: Performance standards that are listed on both the list of most frequently cited standards for AI/AN grantees and grantees nationwide are highlighted in red.